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November 24, 2020

The Honorable Robert M. Levy
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Maliek Brown v. The City of New York, et. al. 19-CV-1575(NGG)(RML)

Your Honor:

I represent Plaintiff. I write, with the consent of defendants, to request an extension of discovery from December 1, 2020 to February 1, 2021.

To date the parties have responded to mutual discovery demands, commenced plaintiff's deposition, and procured voluminous medical records. Recently, plaintiff provided defendants with a proposed second amended complaint. The parties will confer about the filing of this complaint in the coming week.

This matter involves events occurring in multiple locations over the period of seven days, as well as issues, and multiple surgeries, arising from plaintiff's chronic Type 1 diabetes. The parties are working diligently to identify all appropriate witnesses and parties and to produce all necessary evidence. At present, there are no discovery disputes.

I appreciate the Court's consideration of the instant application.

Sincerely,

/s/

Robert Marinelli
Attorney for Plaintiff